

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEREMY LEVIN and DR. LUCILLE LEVIN,

Plaintiffs,

-against-

BANK OF NEW YORK, JP MORGAN
CHASE, SOCIÉTÉ GÉNÉRALE and
CITIBANK,

Defendants.
-----X

JPMORGAN CHASE & CO. and JPMORGAN
CHASE BANK, N.A.,

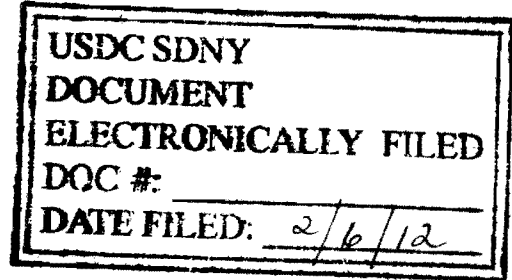
Third-Party Plaintiffs,

-against-

Third-Party Defendants.
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09 Civ. 5900 (RPP) (MHD)

TO BE FILED UNDER
SEAL



STIPULATION,
ORDER AND
JUDGMENT
OF DISMISSAL

WHEREAS this turnover proceeding was commenced by plaintiffs Jeremy and Lucille Levin (the "Levins") on June 26, 2009, by filing their complaint with this Court, in order to enforce a judgment entered in the Levins' favor against the Islamic Republic of Iran and certain related parties (collectively, "Iran"); and

WHEREAS pursuant to orders entered in this proceeding on September 16 and October 5, 2011, defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively "JPMorgan") were given leave to serve and file a third-party complaint in this proceeding against various parties that were involved in or may have an interest in

or a claim to the proceeds of certain blocked wire transfers and blocked deposit accounts that were blocked and are being held by JPMorgan pursuant to Executive Orders issued by the President of the United States and regulations promulgated by the Office of Foreign Assets Control of the United States Treasury Department and that have been designated for inclusion in Phase 2 of this proceeding (the "JPMorgan Phase 2 Assets"); and

WHEREAS JPMorgan thereafter filed a third-party complaint in this proceeding dated October 6, 2011 (the "October 6, 2011 JPMorgan Third-Party Complaint") that named [REDACTED] as a third-party defendant; and

WHEREAS [REDACTED] acknowledges that it has been duly served with the October 6, 2011 JPMorgan Third-Party Complaint and hereby submits to the jurisdiction of the court to the extent necessary for the entry of this Stipulation, Order and Judgment; and

WHEREAS [REDACTED] now wishes to relinquish and surrender any claims or interest they might have in or to any of the JPMorgan Phase 2 Assets and to be dismissed as a party to this proceeding in order to avoid the expense and inconvenience of continuing to participate in this proceeding; and

WHEREAS the undersigned law firm of CHALOS & CO, P.C. hereby represents and warrants that it is acting as counsel for [REDACTED] in connection with this proceeding and that it is authorized to agree to the terms of this Stipulation, Order and Judgment on [REDACTED] behalf and to relinquish and surrender [REDACTED]'s claims and rights to the JPMorgan Phase 2 Assets as provided herein;

IT IS HEREBY STIPULATED AND AGREED, ORDERED AND ADJUDGED as follows:

1. Any and all claims, rights and/or interests that [REDACTED] ever had, now has or may hereafter have in, to or with respect to the JPMorgan Phase 2 Assets are hereby relinquished, surrendered, terminated and extinguished with prejudice, [REDACTED] covenants and agrees not to assert a claim against JPMorgan with respect to those Assets in any court or tribunal anywhere in the world, and JPMorgan is hereby discharged and released from any liability or obligation of any kind whatsoever to [REDACTED] with respect to the JPMorgan Phase 2 Assets.

2. [REDACTED] has no objection to the entry of an order by the Court awarding some or all of the JPMorgan Phase 2 Assets to another party or parties and discharging JPMorgan from liability with respect to the JPMorgan Phase 2 Assets and agrees not to contest the validity of any such order in any future proceedings.

3. This Stipulation, Order and Judgment constitutes a final judgment, within the meaning of Rule 54(b) of the Federal Rules of Civil Procedure, with respect to [REDACTED]'s claims to and rights, if any, in the JPMorgan Phase 2 Assets, which are discrete and separate claims, and there is no just reason for delay in the entry of judgment with respect thereto.

4. In the event that there are further proceedings in this proceeding with respect to funds or assets held by JPMorgan other than the JPMorgan Phase 2 Assets, [REDACTED] agrees that it may be served with any further or additional third-party summons, third-party complaint or other pleading or process in this proceeding by delivery of such pleading to CHALOS & CO, P.C., at the address for that firm set forth

below, Attention George M. Chalos, with a copy sent by Federal Express or DHL to

[REDACTED]

[REDACTED] and that such service shall be good and sufficient service, and shall suffice to bring it back into this case as a third-party defendant, and [REDACTED] hereby waives any and all defenses relating to the form, manner, adequacy or sufficiency of such service of process upon it.

5. Nothing in this Stipulation, Order and Judgment shall limit, restrict, alter or affect the right of JPMorgan to recover its attorneys' fees in Phase 2 or any other phase or part of this proceeding.

6. As of the date when this Stipulation, Order and Judgment is so ordered, it shall become an enforceable and binding agreement, and its terms and provisions, interpretation and validity shall be governed by the law of the State of New York applicable to contracts made and to be performed entirely within the State of New York, without regard to New York's choice of law rules.

Dated: New York, New York
February 2, 2012

CHALOS & Co, P.C.

By: Kerri M. D'Ambrosio

George M. Chalos

Kerri M. D'Ambrosio

55 Hamilton Avenue

Oyster Bay, NY 11771

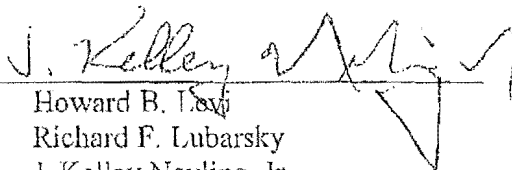
Tel. No. (516) 714-4300

E-mail: gmc@chaloslaw.com

Attorneys for Third-Party Defendant

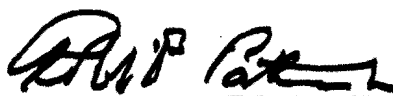
[REDACTED]

LEVI LUBARSKY & FEIGENBAUM LLP

By: 
Howard B. Levy
Richard F. Lubarsky
J. Kelley Nevling, Jr.
1185 Avenue of the Americas, 17th Floor
New York, NY 10036
Tel. No. (212) 308-6100
E-mail addresses: hlevi@llf-law.com or
knevling@llf-law.com

*Attorneys for Defendant and Third-Party
Plaintiffs JPMorgan Chase & Co. and
JPMorgan Chase Bank, N.A.*

SO ORDERED ON FEBRUARY 5, 2012:



United States District Judge